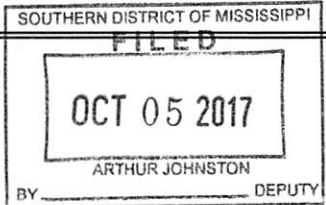


AO 91 (Rev. 11/11) Criminal Complaint

## UNITED STATES DISTRICT COURT

for the

Southern District of Mississippi



United States of America

v.

CARLOS ENRIQUE HERNANDEZ,  
DEMIS NARANJO, AMAURIE TERRERO,  
DENNIS JIMENEZ, ENRIQUE CISNERO, AND  
ROBERTO GONZALEZ

Case No.

3:17mj 163-LRA

Defendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of October 4, 2017 in the county of Hinds in the  
Southern District of Mississippi, the defendant(s) violated:

## Code Section

18 U.S.C. § 1029(a)(3) and (b)(2)

## Offense Description

possession of and conspiracy to possess fifteen or more unauthorized  
access devices or counterfeit credit cards with intent to defraud

This criminal complaint is based on these facts:

See attached affidavit

☒ Continued on the attached sheet.

Complainant's signature

David Polson, United States Secret Service

Printed name and title

Sworn to before me and signed in my presence.

Date: 10/05/2017

Judge's signature

City and state: Jackson, Mississippi

Linda R. Anderson, United States Magistrate Judge

Printed name and title

ASJ-821 jw5118

*[Handwritten signature]*

### **AFFIDAVIT**

I, David Polson, (hereinafter referred to as Affiant), a Special Agent of the United States Secret Service, being duly sworn, hereby depose and state as follows:

I am a Special Agent of the United States Secret Service (USSS) and have been so employed for over fourteen years. As part of my law enforcement duties, I am statutorily charged with investigating criminal cases, including those involving unauthorized access devices, access device making equipment, counterfeit credit cards and related crimes.

Based upon the information obtained as a result of this investigation, there is probable cause to believe that **CARLOS ENRIQUE HERNANDEZ, DEMIS NARANJO, AMAURIE TERRERO, DENNIS JIMENEZ, ENRIQUE CISNERO, AND ROBERTO GONZALEZ** together with others known and unknown, did knowingly together possess and conspire to possess fifteen or more unauthorized access devices or counterfeit credit cards, with intent to defraud, which is prohibited by Section 1029(a)(3) and (b)(2), Title 18, United States Code.

Because this affidavit is being submitted for the limited purposes of securing a complaint and arrest warrant for these individuals, I have not included each and every fact known to me or other law enforcement officers concerning this investigation. I have set forth only those facts that I believe are necessary to establish probable cause to believe that violations of the aforementioned statutes have occurred. The facts set forth in this affidavit are based on my own personal experience and training; discussions I have had with other agents and law enforcement officers; witness statements; and my review of reports, records and other evidence.

### **FACTS OF THE CASE**

On October 4, 2017, a Mississippi Bureau of Narcotics (MBN) Agent was conducting narcotics surveillance at Love's Truck Stop in Flowood, Mississippi, when he noticed a grey Lexus bearing Texas license plate parked on the wrong side of the gas pump. There was no one in the driver seat, but two Hispanic males with tattoos were inside the vehicle. No one was getting gas. As the MBN Agent began observing these individual, the driver returned to the vehicle, and the other individuals exited the vehicle and entered the store one by one. The MBN Agent noticed another car, a Toyota Camry bearing a Texas license plate, pull up next to the same gas pump at the Love's Truck Stop as the Lexus. The individuals in the Camry exited the vehicle and sat on the curb. These individuals appeared to be looking around as if they were waiting on someone.

The MBN Agent had the tags run and discovered they were from Houston, TX. The Lexus departed the Love's Truck Stop while be followed by MBN Agents and stopped at a Waffle House located in Jackson, MS. One individual departed the Lexus and went into the Waffle House for a short time. Upon his return the Lexus departed and drove to a Shell Gas Station next door. One of the individuals entered the Shell Station and one walked across the street to the Marathon Gas Station. At this point, the Toyota Camry arrived at the Marathon Gas Station. Law Enforcement Officers noticed the individual's in the two cars rotating positions in

the cars, going up to the gas pumps, going in the stores, but never getting gas. The MBN Agent contacted the Mississippi Highway Patrol to assist in investigating.

Mississippi State Troopers pulled up on both vehicles when they were parked at the Waffle House. While asking individuals later identified as **CARLOS ENRIQUE HERNANDEZ, DENNIS JIMENEZ, ENRIQUE CISNERO, and ROBERTO GONZALEZ**, to exit the Lexus, the MBN agent saw a skimming device, credit cards, and a white laptop in the vehicle. MBN Agents asked for consent to search a backpack. After consent was given, an unknown amount of cash was discovered inside the backpack.

When a Mississippi State Trooper requested the individuals later identified as **DEMIS NARANJO and AMAURI TERRERO** to exit the Camry, nothing was seen in plain sight but he did smell the odor of marijuana. Trooper Puckett requested consent to search the Camry. **DEMIS NARANJO**, the driver, gave consent to search the vehicle. Upon opening the trunk, four gas pump skimmers were found.

U.S. Secret Service Special Agent Scott Frazier requested consent to search of the Lexus from **ROBERTO GONZALEZ** who stated the vehicle belonged to him. Upon searching of the vehicle, approximately thirty (30) re-encoded credit cards were discovered, along with seven thousand two hundred and eighty dollars (\$7280.00) in U.S. currency, a credit card re-encoder, and a laptop.

Based on the foregoing, I respectfully submit that probable cause exists for an arrest warrant for **CARLOS ENRIQUE HERNANDEZ, DEMIS NARANJO, AMAURIE TERRERO, DENNIS JIMENEZ, ENRIQUE CISNERO, AND ROBERTO GONZALEZ**, for possessing and conspiring to possess fifteen or more unauthorized access devices or counterfeit credit cards, with intent to defraud, all in violation of §1029(a)(3) and (b)(2), Title 18, United States Code.



J. David Polson  
Special Agent  
United States Secret Service

Sworn and subscribed before me, this the 5<sup>th</sup> day of October, 2017.



Honorable Linda R. Anderson  
United States Magistrate Judge